



# MERCY MEDICAL AIRLIFT

Charitable Medical Air Transport Programs  
Serving Virginia and the Nation

P.O. Box 1940 Manassas, VA 22110 (703) 361-1191 Fax (703) 361-1792

## BOARD OF DIRECTORS

Frederick Smith, Ph.D.  
Chairman  
Manassas, VA

Maj. Gen. Clark Smith, USAF (Ret.)  
Vice-Chairman  
Logistics Management Inst.  
Alexandria, VA

Edward Boyer, P.E.  
President / CEO  
Noblesville, VA

Benjamin L. Aaron, M.D.  
George Washington Med. Ctr.  
Washington, DC

Harry Weaver, M.D.  
Physician in Private Practice  
Fusion, VA

Keith Green, Esq.  
Fisher & Green  
Roanoke, VA

Leo Schuman  
Henningsen Builders, Inc.  
Silver Spring, MD

April 26, 1996

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20054

Re: Comments of Mercy Medical Airlift  
RM-8784

Dear Mr. Caton:

Attached are the Comments of Mercy Medical Airlift concerning the petition of Sky Station International, Inc. to establish a Global Stratospheric Telecommunications Service (GSTS).

An original and five copies of the Comments are provided.

Sincerely,

Edward R. Boyer, P.E.  
President/CEO

Attachments

## ADVISORY COMMITTEE

Joe Gibbs, Chairman  
National Football League (NFL)  
The Memorial Park E. Wolf  
U.S. House of Representatives  
Don Lopez  
Symposium Associates  
National Air and Space Museum  
William Kinneg  
Past Chairman  
U.S. Chamber of Commerce  
General David G. Jones, USAF (Ret.)  
Former Chairman of the  
Joint Chiefs of Staff  
Brigadier General M. Doherty, Jr.  
Apollo Astronaut  
C. Davis Waples  
Secretary of Defense  
Louis Evans, Jr., Ph.D.  
Author and Speaker  
Jerry Feltus  
Coca-Cola Company (Ret.)  
Richard Kohnert  
Past President  
American Red Cross  
Kenneth Brown  
Retired Director  
Department of Aviation  
Commonwealth of Virginia

Federal Air Courier  
Cert. AMYHAG198

Oct 9  
DET

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of Amendment of Parts 2  
and 15 of the Commission's Rules to  
Permit Use of Radio Frequencies Above  
40 GHz for New Radio Applications

Petition of Sky Station International, Inc.  
for Amendment of the Commission's  
Rules to Establish Requirement for a  
Global Stratospheric Telecommunications  
Service in the 47.2-47.5 GHz and  
47.9-48.2 GHz Frequency Bands

RM-8784

COMMENTS OF Mercy Medical Airlift.

Mercy Medical Airlift submits these Comments in support of the Petition of Sky Station International, Inc. ("Sky Station") to establish a new Global Stratospheric Telecommunications Service ("GSTS") in the 47.2-47.5 GHz and 47.9-48.2 GHz Frequency Bands. Mercy Medical Airlift urges the Commission to implement promptly appropriate rules for the implementation of GSTS so that this service can be made available to the public as soon as possible. As explained below, the telecommunications services offered by GSTS will serve the public interest by providing the air medical transport and medical-relief community with a superior method of exchanging and accessing critical health care information and communicating operational messages. Mercy Medical Airlift believes, therefore, that GSTS will lead not only to improved health care across the globe, but that it will make a difference in the number of lives saved.

## I. BACKGROUND AND STATEMENT OF INTEREST

Mercy Medical Airlift is an organization that provides, coordinates and manages a nationwide network of charitable air medical transport non-profit charity organizations serving the public good. There are scores of patients moved daily all over the U.S. and reliable, inexpensive telecommunications and position tracking data is an essential component for all operations. Federal Aviation Regulations require that MMA medical and flight crews stay in touch with our Medical Director and dispatch office. The current extremely high price of such remote communications keeps our airborne crews tied to making calls from ground pay phones every time they land - often delaying flights. When our medical crews need physician direction - they must now again find pay phones (as cellular phone won't work because they are landing in different cities and towns). This works very poorly and is frankly unreliable. Mercy Medical Airlift is involved in the transport of nearly 7,000 patients per year. Reliable low-cost communications is essential to our operation.

## II. PUBLIC INTEREST BENEFITS OF GSTS

GSTS will provide the medical community and the medical air transport community with a much needed world-wide, affordable, and reliable communications service. In the medical area, the ability to exchange information quickly and reliably is critical. In some areas, those providing medical assistance

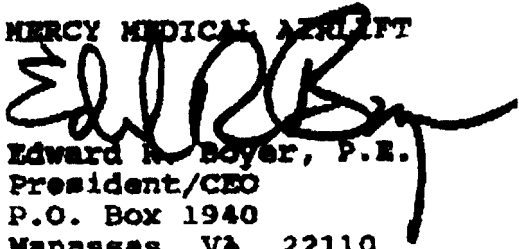
cannot even afford to access such vital information or communicate their needs of situation. Through the low-cost global services provided by GSTS, however, the medical-relief and air medical transport communities will now be in a position to access and to transmit around the world, including to third world countries, life-saving health care information. Such information would include, for example, telemedical diagnoses of injuries and diseases. Further, GSTS will enhance universal emergency rescue and warning services. Thus, GSTS will not only assist the medical relief and air medical transport communities in meeting medical needs and treating illness and disease, but it may, in fact, prevent medical disasters from occurring in the first place.

### III. SUMMARY

In summary, Mercy Medical Airlift believes that the telecommunications service offered by GSTS will enhance international and stateside medical-relief efforts. The interest of the public is best-served by improved and increased exchange of medical information. Mercy Medical Airlift strongly supports the petition of Sky Station and urges the Commission to implement promptly rules for GSTS.

Respectfully submitted,

MERCY MEDICAL AIRLIFT

  
Edward R. Boyer, P.E.  
President/CEO  
P.O. Box 1940  
Manassas, VA 22110

Date Submitted: April 26, 1996